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EPA Region 5 Records Ctr.



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The Gates Rubber Company
990 South Broadway
P.O. Box 5887
Denver, Colorado 80217
(303) 744-1911

November 5, 1991

Director, Division of Air Pollution Control
Environmental Protection Agency
2200 Churchill Road
P.O. Box 19276
Springfield, ILL. 62794-9276 62706

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ENV-UNPO-SPELD

Dear Director,

Permitting requirements for emission sources under your state's air pollution regulation is not clearly understood in reference to typical situations that exist in Gates Rubber Company facilities. I'd appreciate the opportunity to discuss these situations, which are described below, with you. A written reply, phone call to me at 303-744-4935, or a face to face meeting at your convenience would be appreciated.

(Reference SKETCH ENV. 498)

Emission 1

This situation is straight forward and it is recognized that an application for an emission permit is required for this source and its control device.

Emission 2

Material balance or measurements can prove that particulate, visibility standards or other appropriate standards are not exceeded in this situation. Is there still an obligation to apply for a permit, register the source or in some other way notify the control agency?

Emission 3

Steam is released from a vulcanizer (autoclave) at the end of a cure cycle.

In situation A, the steam is in direct contact with the uncured rubber products and some de minimis, trace amount of oil may be entrained with the steam.

In situation B, the steam is not in direct contact with uncured rubber products and no oil or other pollutants are entrained with the steam.

Is there an obligation to apply for a permit, register the source or in some other way notify the control agency for either of these situations?

Emission 4

Minute amounts of pollutants are emitted and are exhausted to the in-plant environment through a control device. Industrial hygiene monitoring confirms that no health standard is exceeded. An electrostatic precipitator for fume or smoke removal or use of a cyclone separator or baghouse for removal of particles from a grinding operation are typical.

There is no direct exhaust from the system to the outside atmosphere. General area roof exhaust fans may exist in conjunction with normal industrial building heating and ventilation.

Is there a permit application, registration, or notification obligation for the non VOC, non HAP situation A? Is this obligation different if a VOC or HAP is involved as in situation B?

Emission 5

Minute amounts of pollutants are emitted to the in-plant environment. Industrial hygiene monitoring confirms that no health standard is exceeded. There is no direct exhaust from the equipment to the outside atmosphere. General area roof exhaust fans may exist in conjunction with normal industrial building heating and ventilation.

Is there a permit application, registration, or notification obligation for the non VOC, non HAP situation A? Is this obligation different if a VOC or HAP is involved as in situation B?

The Gates Rubber Company intends to comply with your state's air pollution regulations and the clarification requested in this letter will certainly help us in maintaining that compliance.

Very truly yours,



E. W. Karger
Manager, Environmental and
Property Protection

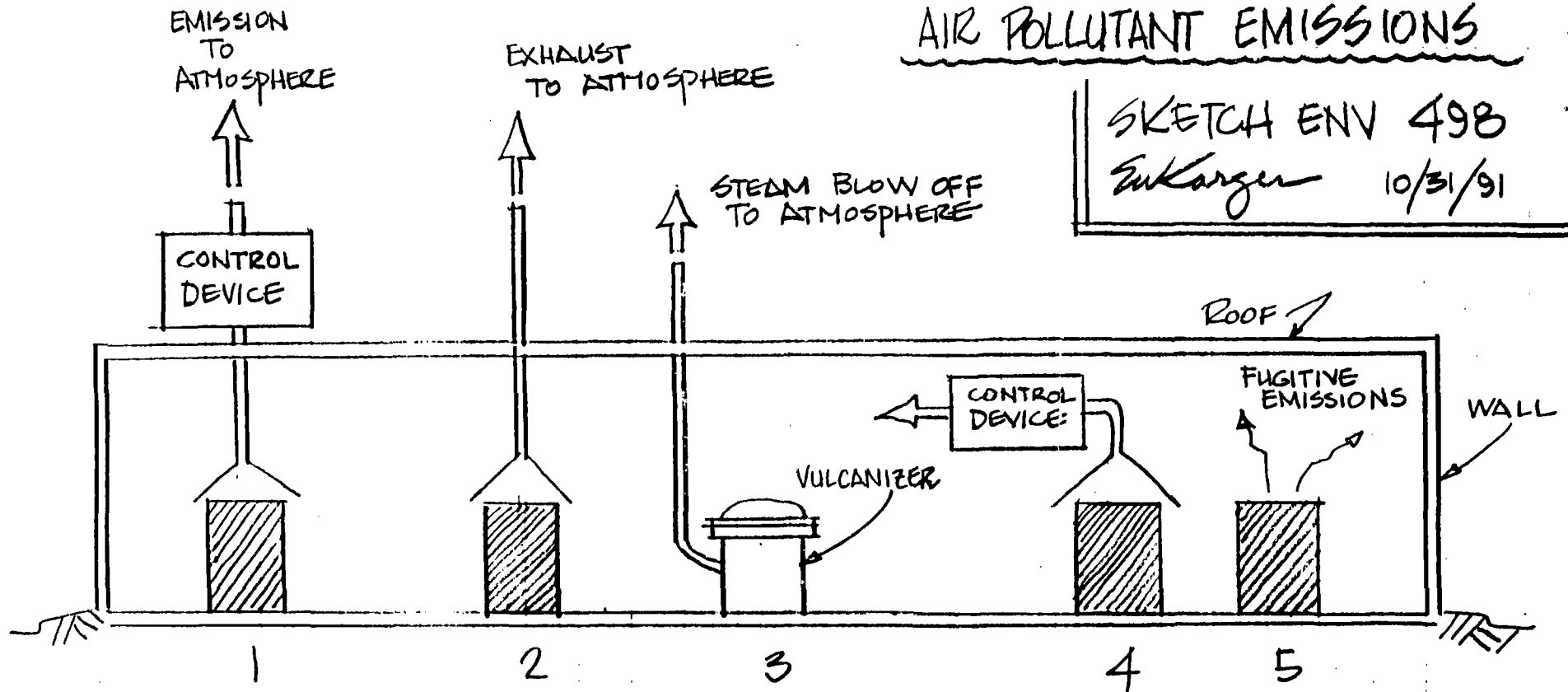
cc: P. D. McFadden
Juris Laipenieks - Eng.
Merry Ann Vernon - Legal

ADDRESS2

AIR POLLUTANT EMISSIONS

SKETCH ENV 498

Eukarger 10/31/91



1. EMISSION SOURCE W/CONTROL DEVICE
2. HEAT OR DENIMIMIS POLLUTANT DISCHARGE • NO VOC OR HAZ. AIR POLLUTANT (HAP)
3. STEAM DISCHARGE
 - A. CONTACTS UNCURED RUBBER
 - B. DOES NOT CONTACT UNCURED RUBBER
4. NO DISCHARGE TO OUTSIDE ATMOSPHERE • CONTROL DEVICE FOR INDOOR AIR QUALITY
 - A. PARTICULATE OR OTHER NON-VOC OR NON-HAP
 - B. VOC OR HAP
5. SAME AS 4 EXCEPT NO CONTROL DEVICE
 - A. PARTICULATE OR OTHER NON-VOC OR NON-HAP
 - B. VOC OR HAP